

United States District Court		DISTRICT Eastern District of Pennsylvania <i>(Handwritten circled '1')</i>
UNITED STATES OF AMERICA v. SHAWN HILLIARD		DOCKET NO.
		MAGISTRATE'S CASE NO.
		<i>14-166-M-file</i>
Complaint for a violation of Title 18, United States Code Sections 1344 and 2. <i>MICHAEL KUNZ Clerk DEP Court By MAC</i>		
NAME OF JUDGE OR MAGISTRATE Honorable Henry S. Perkin		OFFICIAL TITLE US Magistrate Judge
LOCATION Philadelphia, PA		
DATE OF OFFENSE November 1, 2013	PLACE OF OFFENSE Philadelphia, PA	ADDRESS OF ACCUSED (if known) Unknown
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION: On or about November 1, 2013, defendant SHAWN HILLIARD, knowingly executed, attempted to execute, and aided and abetted a scheme to defraud Citibank and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises in violation of Title 18, United States Code, Sections 1344 and 2.		
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED: SEE ATTACHED AFFIDAVIT		
MATERIAL WITNESSES IN RELATION AGAINST THE ACCUSED:		
Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.		SIGNATURE OF COMPLAINANT (official title) <i>Michael Johnson</i>
		OFFICIAL TITLE Special Agent, HSI
Sworn to before me and subscribed in my presence.		
SIGNATURE OF MAGISTRATE <i>Honorable HENRY S. PERKIN, US Magistrate Judge</i>		DATE <i>2/20/14</i>

AFFIDAVIT

14-166-M

I, Michael Johnson, being duly sworn, depose and state as follows:

1. I am a Special Agent of Homeland Security Investigations (“HSI”) of the Department of Homeland Security and have been employed as a Special Agent with HSI, and its predecessors, Immigration and Customs Enforcement (“ICE”), Office of Investigation and United States Customs Service (“USCS”) since 2003. Prior to this, I served as an Inspector with the United States Customs Service. As a Special Agent for HSI, I have investigated various financial crimes, including money laundering, bank fraud, structuring, and wire fraud, as well as crimes involving stolen identities.

2. I am part of a team from HSI and the United States Secret Service (“USSS”) that is investigating an identity theft and bank fraud scheme perpetrated by SHAWN HILLIARD a/k/a “BUGGZ” a/k/a “RICK” and others. HSI and USSS continue to investigate a large-scale bank fraud scheme perpetrated by HILLIARD and others.

3. The information contained in this affidavit is based upon my personal knowledge, information provided to me by other law enforcement officers, information provided by victims of fraud, information provided by various banks impacted by the fraud, including TD Bank, Citibank, and Wells Fargo Bank, and my review of documents. All of these banks, including Citibank, were financial institutions insured by the FDIC.

4. Because this affidavit is being submitted for the limited purpose of obtaining a criminal complaint against SHAWN HILLIARD, a/k/a “BUGGZ” a/k/a “RICK”, I have not included each and every fact known to me concerning this investigation.

INVESTIGATION

5. The current investigation was brought to the attention of HSI and USSS in September of 2013. The investigation has revealed that HILLIARD has been involved with a bank fraud organization for several years, as far as March 26, 2012, with the bulk of the criminal activity being committed between April and November of 2013. In this time frame, this organization, which HILLIARD is one of the lead members, has been linked to at least 127 victims of identity theft and \$1,071,091.00 in losses.

6. Based largely upon information provided by the banks themselves, this investigation has identified numerous bank employees whom are providing customer information to members of this criminal organization. Corrupted bank employees who are associated with this bank fraud organization have been identified at Citi Bank, TD Bank, Wells Fargo Bank, and others. For example, TD Bank provided me with bank security footage showing a bank teller, who is associated with this bank fraud organization, stealing customer account information. The information which this teller and other tellers stole includes customer

names, dates of birth, social security numbers, and account numbers. As I describe in more detail below, once the account information is secured, members of this organization, including HILLIARD, recruit people in need of money to enter the bank posing as the account holder. That individual is provided with a fake identification card, a pre-filled out withdrawal slip, and personal information of the account holder by HILLIARD and others. Those imposters then enter the bank, make large cash withdraws, and at times, obtain an ATM card for the account. When an ATM card is secured, cash withdraws are made by HILLIARD and others. HILLIARD has also been identified as acting as a lookout for the imposters while they make the cash withdraws or obtain the debit card.

7. Prior to making the withdraw, a phone call is made into the various banking centers in order to obtain a current balance on the account. Toll records have been received for numerous phones that have called into the various call centers. These phone records cross over into numerous banks, including but not limited to TD Bank, Citibank, and Wells Fargo. In addition, several of the imposters employed by this organization have been observed conducting fraud at various banks.

8. This investigation has revealed numerous imposters whom are working for this organization. One of these imposters has been identified as Rosa Samuels. Samuels was identified as withdrawing funds and obtaining ATM cards from both TD Bank and Citibank. On several occasions, video and/or photo footage showed the same tall black male, later identified by Samuels and others as HILLIARD, appearing with Samuels in the bank. HILLIARD was also observed on video utilizing the ATM card that had been secured by Samuels. HILLIARD appears on surveillance video surveillance footage in transactions in which Samuels was involved in four different cases involving TD Bank, including the accounts of identity theft victims R.K., D.F., K.P., and J.L. Additionally, HILLIARD was observed in five cases involving Samuels at Citibank, including the accounts of identity theft victims S.Z, A.D., M.E, L.K. and Z.S. Samuels has been linked to \$160,900 worth of fraud at TD Bank and Citibank.

9. On July 13, 2013, Samuels fraudulently withdrew \$9,000 from the account of identity theft victims D.F in Tysons Corner, VA. During this withdraw, HILLIARD was seen accompanying Samuels on numerous occasions was observed making a transaction utilizing the teller beside Samuels. A review of that transaction indicated that a deposit was being made by HILLIARD into TD Bank account number 4940982451 in the name of Jessica Warner. I believe that Jessica Warner is a friend of HILLIARD. TD Bank officials reviewed all of the deposits made into the account of Jessica Warner and identified a deposit on February 1, 2012 which was made in the name SHAWN HILLIARD. A picture of SHAWN HILLIARD was obtained. The photo of SHAWN HILLIARD a/k/a "BUGGZ" a/k/a "RICK" appears to be the same black male accompanying Samuels in the above transactions.

10. A search of commercial data bases indicates that Jessica Warner is associated with telephone number 646-639-0906. Further, Warner's TD Bank account shows a contact number of 646-639-0906. As described below, HILLIARD has been identified as utilizing telephone number 646-938-3532. This number used by HILLIARD, 646-938-3532, was in contact with Jessica Warner's telephone number 646-639-0906 1803 times between the dates of May 11, 2013 and December 28, 2013.

11. On July 19, 2013, Samuels was arrested in Newtown Township, Bucks, County, PA after attempting to withdraw funds from a TD Bank account utilizing a fake identification. This account belonged to someone other than Samuels and Samuels did not have permission to withdraw any money from this account. At the time of her arrest, Newtown Township Police recovered numerous items from Samuels, including a fake identification, a withdraw slip, an owner's manual to a 2010 Chevy Camaro, and a Metro PCS mobile phone. A search of the contacts in this phone identified a phone number of 646-938-3532 listed under the names "BUGGZ" and "SHW" – the same number associated with HILLIARD as described above. The call history of this phone taken from Samuels showed numerous contacts with this number, including the last called made before her arrest. Further, surveillance video from this date shows the same tall black male, believed to be HILLIARD, in the parking lot outside of the TD Bank store. This tall black male is observed getting into a newer model white Chevy Camaro.

12. On December 13, 2013, as part of this investigation, a proffer was conducted with Samuels and her attorney. The information provided by Samuels during the proffer proved to be reliable and was corroborated by phone records, bank surveillance footage, and other police reports. During the proffer, Samuels was shown surveillance photos from the bank of the tall black male, whom the agents believed to be HILLIARD, seen with her on several occasions. Samuels identified this individual as her "handler." She stated that she knew this person by the name of "RICK." Samuels was shown a driver's license photo of SHAWN HILLIARD and she stated that she thought it was "RICK." Samuels stated that the phone number that she contacted "RICK" on was the number listed in her phone under the name "BUGGZ" (646-938-3532). Samuels further stated that she had worked for "RICK" for several years as one of his runners conducting bank fraud. Samuels stated that HILLIARD would provide her with a fake identification, customer account information, and a pre-filled out withdrawal slip. HILLIARD would drive her to various banks where she would go into the bank and either make a withdrawal or obtain an ATM card. HILLIARD would either come in with her and distract the teller or wait in the car. The cash that she took out or the ATM card that she received was always given to HILLIARD. HILLIARD would then pay Samuels ten percent of the money that she withdrew from the account. Samuels stated that HILLIARD drove a 2010 white Chevy Camaro. She stated that she used the owner's manual from the car, which was recovered from her at the time of her arrest, to transport the pre-filled out withdrawal slips into the bank.

13. On January 1, 2014, an arrest report was obtained in reference a previous arrest of Samuels. On August 7, 2012, Samuels was arrested in New Rochelle, NY after attempting to withdraw \$4,750 from a Chase Bank account belonging to identity theft victim J.H. utilizing a fake Texas Driver's License. After her arrest, Samuels gave a statement to New Rochelle Police Officer Kevin McKenna. At this time, she indicated that she was working for "RICK" and it was "RICK" who gave her the driver's license and customer account information. Samuels stated that she was homeless and a drug addict and "RICK" promised her a couple hundred dollars for committing the bank fraud. Based upon Samuels's statements and the other evidence in this case, I believe "RICK" is SHAWN HILLIARD.

14. On November 1, 2013, another imposter for this enterprise who is now cooperating with this investigation whom I will refer to hereinafter as CS-1, was arrested in

Philadelphia, PA, after attempting to withdraw funds from a Citibank account utilizing a fake identification. This account belonged to someone other than CS-1 and CS-1 did not have permission to withdraw any money from the account. When CS-1 realized he had been identified by bank personnel as an imposter he attempted to flee. As he was fleeing, the bank manager who was following him observed CS-1 on his phone. Philadelphia Police were able to intercept CS-1 and take him into custody. At the time of his arrest, Philadelphia Police officers recovered a Samsung Galaxy SIII mobile phone from CS-1. A search of this phone revealed the most recent calls made by CS-1 before his arrest were made to phone number 646-938-3532. This number was listed in CS-1' phone number the name "BUGGZ" – an alias used by SHAWN HILLIARD. This is the same phone number and name listed for Samuels' handler identified as HILLIARD as stated above in paragraph 11. CS-1 has been linked to \$96,500 in fraud at Wells Fargo and Citibank.

15. Further search of CS-1's phone showed the following text message conversation occurred on October 24, 2013 between CS-1's phone and 646-938-3532 (HILLIARD).

CS-1:	Checking or Savings?
BUGGZ:	Savings
BUGGZ:	Last transaction 21 st , \$2,000
BUGGZ:	Withdrawal
BUGGZ:	Let's go

Based upon my training and experience and the evidence gathered during this case, I believe that during this text message exchange, HILLIARD was providing instructions to CS-1 from which account he should steal money.

16. On November 19, 2013, CS-1 was interviewed as to his involvement in investigation. The information provided by CS-1 proved to be reliable and was corroborated by phone records, bank surveillance footage, and other police reports. CS-1 stated that in September of 2013, he was introduced to an individual whom he knows only by the name "BUGGZ." CS-1 was later shown a picture of SHAWN HILLIARD and positively identified HILLIARD as "BUGGZ." CS-1 stated that HILLIARD had recruited CS-1 to participate in a bank fraud scheme whereas HILLIARD would provide CS-1 with customer account information, a pre-filled out withdraw slip, as well as a fake identification with CS-1' picture on it. CS-1 would withdraw money from the account, as well as obtain ATM cards for these accounts. CS-1 stated he would be paid fifteen percent of whatever money was secured perpetrating the fraud. HILLIARD told CS-1 that he could make between \$5,000 and \$7,000 per month.

17. CS-1 said HILLIARD was his main contact. He described HILLIARD as a black male in his late 20's, between 6'7"and 6'9", 260 lbs, and currently has braids in his hair. CS-1 was shown two pictures, one from TD Bank and one from Citibank, of a tall black male who had

been observed in the branch locations during previous associated account take-overs. CS-1 identified both photos to be HILLIARD.

18. CS-1 stated that HILLIARD drives a 2007-2010 White Chevy Camaro. As mentioned above, Samuels also stated that HILLIARD a/k/a BUGGZ drove a white Camaro, and in fact, the owner's manual from that Camaro was recovered from Samuels when she was arrested.

19. CS-1 stated that he did his first job for the organization in late September or early October, 2013. He stated that he has accessed accounts in Brooklyn three or four times, however, they do not like to defraud banks where they live. He stated the majority of the banks are in New Jersey, Pennsylvania, Maryland, and Virginia. He stated that they would withdraw funds from Wells Fargo, Chase, and Citi Banks. CS-1 estimated that he had successfully defrauded banks approximately 14 times and had made an additional 9 attempts which were unsuccessful. He estimated that he had taken between \$60,000 and \$70,000 from the various banks.

20. CS-1 stated that he had been issued several ATM cards from Citibank, which HILLIARD would use to withdraw money. CS-1 stated HILLIARD would often times go right back into the same bank that the ATM card had been secured and withdraw the money. After several withdrawals, they would then travel to another nearby branch and HILLIARD would withdraw additional money utilizing the ATM card.

21. CS-1 was shown a picture of Rosa Samuels and said that she was be the "old lady" that HILLIARD had told him about. CS-1 stated that he was told by HILLIARD that he had a little old gray haired lady working for him whom he had recruited from a homeless shelter. HILLIARD said that she had saved enough money to move out of the homeless shelter and into an apartment.

22. CS-1 stated that HILLIARD generally waited outside in the car until he had completed his business. He stated that when HILLIARD did come inside the bank, he often cashed out a one hundred dollar bill for ones. CS-1 stated that HILLIARD had wanted him to go to Chicago, where they would rent a car and hit several banks while driving back to New York. He stated that they had also talked about going to California.

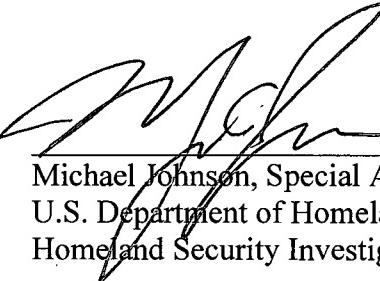
23. A review of video and /or still photography related to the several fraudulent transactions conducted by CS-1 identified HILLIARD as either being in the bank or utilizing the ATM card secured by CS-1 on two occasions. These include the Citibank Accounts of identity theft victims E.C. and E. F.

24. In addition to CS-1 and Samuels, this organization utilized numerous additional imposters, some of whom have been identified and some of whom have not yet been identified. Of these additional imposters, HILLIARD a/k/a BUGGZ was observed on video and/or still photos as being associated with at least three different additional imposters. The accounts associated with HILLIARD a/k/a BUGGZ include the Citibank accounts of identity theft victims T.L., A.G. and P.P.

25. According to flight records, SHAWN HILLIARD is scheduled to leave the United States on February 21, 2014, traveling from JFK Airport in New York to Santiago, Dominican Republic.

CONCLUSION

26. Based on the above facts, I believe that there is probable cause to conclude that on November 1, 2013, in the Eastern District of Pennsylvania and elsewhere, SHAWN HILLIARD did knowingly commit and offense against the United States, that is, to knowingly executed, attempted to execute, and aid and abet the execution of, a scheme to defraud Citibank and to obtain monies owned by and under the care, custody, and control of Citibank by means of false and fraudulent pretenses, representations, and promises, in violation of 18 U.S.C. § 1344 (Bank Fraud), 18 U.S.C. § 2 (Aiding and Abetting). Therefore, I request that a warrant be issued for the arrest of SHAWN HILLIARD a/k/a BUGGZ, a/k/a RICK.



Michael Johnson, Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn and subscribed
before me this 2nd day
of February, 2014.



HON. HENRY S. PERKIN
United States Magistrate Judge